

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 20- 304
	:	
v.	:	DATE FILED: 9/15/2020
	:	
CARVO FAIRLEY	:	VIOLATIONS:
	:	18 U.S.C. § 201(b)(1)(A) and (C)
	:	(bribery – 5 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Defendant CARVO FAIRLEY resided in Philadelphia, in the Eastern District of Pennsylvania.
2. Defendant CARVO FAIRLEY was involved in the distribution of a controlled substance, that is, marijuana, in the Eastern District of Pennsylvania.
3. Greg Reilly, charged elsewhere, worked as a United States Postal Carrier employed by the United States Postal Service (“USPS”) and was therefore a “public official” as defined by Title 18, United States Code, Section 201(a)(1).
4. Gregg Reilly was a postal carrier at the Frankford Post Office, located at 4410 Paul Street, Philadelphia, Pennsylvania, and was responsible for delivering USPS packages to addresses along his assigned postal route.
5. As a postal carrier, Gregg Reilly owed the USPS the duty to, among other things:
(a) ensure the security and integrity of the mail; (b) safeguard the mail against use by individuals and enterprises engaged in criminal activity, including trafficking in narcotics; (c) deliver the

mail to the specified addressee; (d) handle undeliverable mail in accordance with USPS policies and regulations; and (e) correctly and accurately record the delivery of each USPS package sent via Priority Mail.

6. Gregg Reilly used his official position with USPS to support the illicit transportation and delivery of packages containing marijuana to defendant CARVO FAIRLEY.

7. Greg Reilly provided defendant CARVO FAIRLEY with a list of residences along his postal route for FAIRLEY to use as addresses on packages to be mailed to Philadelphia.

8. Defendant CARVO FAIRLEY and other conspirators mailed and caused to be mailed packages containing marijuana via USPS mail service from California, and addressed to fictitious names at addresses on Gregg Reilly's postal route.

9. Defendant CARVO FAIRLEY then alerted Gregg Reilly to the dates that the packages containing marijuana were scheduled to arrive at the Frankford Post Office in Philadelphia, Pennsylvania.

10. When the packages arrived at the Frankford Post Office, defendant CARVO FAIRLEY met with Gregg Reilly at prearranged locations on Reilly's postal route.

11. Defendant CARVO FAIRLEY paid cash to Gregg Reilly in exchange for receiving the packages containing marijuana.

12. On or about December 29, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CARVO FAIRLEY,

directly and indirectly, corruptly gave, offered, and promised a thing of value to Gregg Reilly, a public official, with intent to influence an official act and to induce Gregg Reilly to do an act and

omit to do an act in violation of his official duty, that is, defendant CARVO FAIRLEY gave, offered and promised cash to Gregg Reilly in return for the diversion of two U.S.P.S. packages, from the addressees marked on those packages for delivery by the USPS, to defendant CARVO FAIRLEY for the purpose of the distribution of marijuana contained within the packages.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 of Count One are incorporated herein.
2. On or about January 19, 2018, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CARVO FAIRLEY,

directly and indirectly, corruptly gave, offered, and promised a thing of value to Gregg Reilly, a public official, with intent to influence an official act and to induce Gregg Reilly to do an act and omit to do an act in violation of his official duty, that is, defendant CARVO FAIRLEY gave, offered and promised cash to Gregg Reilly in return for the diversion of two U.S.P.S. packages, from the addressees marked on those packages for delivery by the USPS, to defendant CARVO FAIRLEY for the purpose of the distribution of marijuana contained within the packages.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 of Count One are incorporated herein.
2. On or about February 26, 2018, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CARVO FAIRLEY,

directly and indirectly, corruptly gave, offered, and promised a thing of value to Gregg Reilly, a public official, with intent to influence an official act and to induce Gregg Reilly to do an act and omit to do an act in violation of his official duty, that is, defendant CARVO FAIRLEY gave, offered and promised cash to Gregg Reilly in return for the diversion of two U.S.P.S. packages, from the addressees marked on those packages for delivery by the USPS, to defendant CARVO FAIRLEY for the purpose of the distribution of marijuana contained within the packages.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 of Count One are incorporated herein.
2. On or about March 26, 2018, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

CARVO FAIRLEY,

directly and indirectly, corruptly gave, offered, and promised a thing of value to Gregg Reilly, a public official, with intent to influence an official act and to induce Gregg Reilly to do an act and omit to do an act in violation of his official duty, that is, defendant CARVO FAIRLEY gave, offered and promised cash to Gregg Reilly in return for the diversion of a U.S.P.S. package, from the addressee marked on the package for delivery by the USPS, to defendant CARVO FAIRLEY for the purpose of the distribution of marijuana contained within the package.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 of Count One are incorporated herein.
2. On or about February 25, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CARVO FAIRLEY,

directly and indirectly, corruptly gave, offered, and promised a thing of value to Gregg Reilly, a public official, with intent to influence an official act and to induce Gregg Reilly to do an act and omit to do an act in violation of his official duty, that is, defendant CARVO FAIRLEY gave, offered and promised cash to Gregg Reilly in return for the diversion of a U.S.P.S. package, from the addressee marked on the package for delivery by the USPS, to defendant CARVO FAIRLEY for the purpose of the distribution of marijuana contained within the package.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation(s) of Title 18, United States Code, Section 201(b)(1)(A) and (C), as set forth in this indictment, defendant

CARVO FAIRLEY

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violation(s).

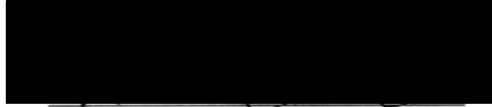
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:



FOREPERSON

Ronald Barock for

WILLIAM M. McSWAIN
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

CARVO FAIRLEY

INDICTMENT

Counts

18 U.S.C. § 201(b)(1)(A) and (C) bribery – 5 counts

[REDACTED]

Foreman

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____